

Kenneth A. Goldberg, Esq.
GOLDBERG & FLIEGEL LLP
60 East 42nd Street, Suite 3520
New York, New York 10165
(212) 983-1077
Attorneys For Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TASSO KOUMOULIS, CHRISTOS HATZIS,
DOMINIC MILITO, AND PETER DAFNIOTIS, : **10-cv-0887 (PKC) (VMS)**

Plaintiffs, :

- against - :

INDEPENDENT FINANCIAL MARKETING :
GROUP, INC., LPL FINANCIAL
CORPORATION, AND ASTORIA FEDERAL :
SAVINGS AND LOAN ASSOCIATION,

Defendants. :

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**CERTIFICATION OF PLAINTIFFS’
COUNSEL IN RESPONSE TO THE
COURT’S MEMORANDUM AND ORDER
DATED NOVEMBER 1, 2013**

I, KENNETH A. GOLDBERG, of full age, hereby certify and say:

1. I am counsel for Plaintiffs in the above-captioned matter.
2. I make this certification pursuant to the Court’s Memorandum And Order dated November 1, 2013 (Civil Docket Document Number 50), which was affirmed by the Court’s Memorandum & Order dated January 21, 2014 (Civil Docket Document Number 60).
3. Plaintiffs have made a diligent and good faith effort to locate and produce all relevant and non-privileged documents, including e-mails, responsive to Defendants’ request as referred to in Civil Docket Document Number 50.
4. A reasonable estimate of the number of privileged documents responsive to Defendants’ request is less than 15.

5. I have re-reviewed the responsive attorney-client or work-product privileged documents.

6. The responsive privileged documents were not provided to persons other than the Plaintiffs and Plaintiffs' counsel.

7. No non-privileged documents responsive to Defendants' above request are being withheld.

Dated: New York, New York
February 13, 2014

GOLDBERG & FLIEGEL LLP

/s/ Kenneth A. Goldberg

By: _____
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60 East 42nd Street, Suite 3520
New York, New York 10165
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Attorneys for Plaintiffs